



**DIEMOLDING CORPORATION**

October 17, 2005

Ms. Kathleen Farrell  
Clerk of the Court  
United States Bankruptcy Court  
One Bowling Green, Sixth Floor  
New York, NY 10004-1408

Re: Delphi Corporation

Dear Ms. Farrell:

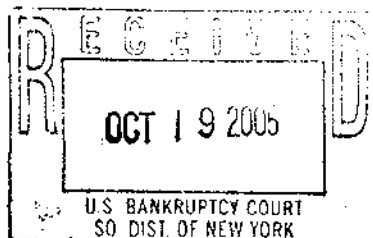
Enclosed please find our NOTICE OF RECLAMATION, OR ALTERNATIVELY, FOR A PRIORITY CLAIM OR LIEN in the matter of Delphi Corporation, Chapter 11 Case No. 05-44481.

I have also enclosed a copy of our claim and a postage-paid return envelope. Please return to me a date-stamped copy as proof of filing.

Please contact me should you have any questions regarding this claim.

Sincerely,

Brian J Simchik  
CFO



Cc:

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

DELPHI CORPORATION, *et al.*

Debtors,

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Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

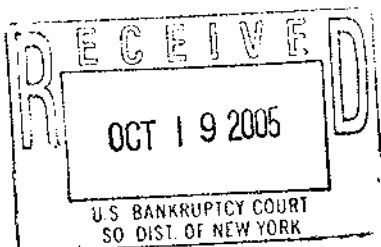
NOTICE OF RECLAMATION, OR ALTERNATIVELY,  
FOR A PRIORITY CLAIM OR LIEN

Diemolding Corporation serves its Notice of Reclamation, or alternatively, for a Priority Claim or Lien (the "Notice") and respectfully states as follows:

1. On October 8, 2005, (the "Petition Date"), Delphi Corporation and certain of its subsidiaries (the "Debtor") filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code"). Upon information and belief no trustee or examiner has been appointed and the Debtor is operating as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.

2. Prior to the Petition Date, Diemolding Corporation provided the Debtor with certain goods and services which included phenolic brake pistons and related products. Diemolding Corporation provided some of these products to the Debtor within ten (10) days of the Petition Date.

3. Diemolding Corporation hereby makes a demand to the Debtor for reclamation pursuant to 11 U.S.C. § 546(c). In the alternative, Diemolding Corporation seeks a



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priority claim or lien for products provided to the Debtor during the ten (10) days preceding the Petition Date.

4. Pursuant to § 546(c) of the Bankruptcy Code, a seller may make written demand of reclamation of goods before ten (10) days after receipt by the Debtor or, if the 10-day period expires after the commencement of the case, before 20 days after the Debtor receives the goods. 11 U.S.C. § 546(c)(1). If a court denies a seller's claim for reclamation, it must grant the seller an administrative expense priority or secure the seller's claim with a lien. *See* 11 U.S.C. § 546(c)(2)(A) and (B); 11 U.S.C. § 503(b), 507(a)(1).

5. Pursuant to § 2-702 of the New York Uniform Commercial Code, Diemolding Corporation may reclaim the goods that it provided the Debtors upon demand made within 10 days after the Debtors received the goods. Diemolding Corporation hereby makes demand of reclamation for the following products delivered to the Debtors:

#### INVOICES AND DELIVERIES

Invoice Number	Shipment I.D. Number	Amount	Delivery Date
364243	364243	\$13,952.16	09/28/05
364294	364294	13,952.16	09/30/05
364305	364305	18,602.88	10/03/05
364362	364362	13,952.16	10/05/05
364412	364412	18,602.88	10/10/05
364479	364479	13,952.16	10/12/05
364525	364525	18,602.88	10/14/05
364306	364306	3,487.54	09/28/05
364320	364320	3,487.54	09/29/05
364361	364361	3,487.54	09/30/05
364376	364376	3,487.54	10/03/05

Invoice Number	Shipment I.D. Number	Amount	Delivery Date
364243	364243	\$13,952.16	09/28/05
364411	364411	3,487.54	10/05/05
364438	364438	1,743.77	10/06/05
364507	364507	3,487.54	10/08/05
364528	364528	3,487.54	10/10/05
364347	364347	1,908.00	09/28/05
364434	364434	1,908.00	10/03/05
		(Total) \$ 141,589.83	

6. The above-referenced goods were sold in the ordinary course of Diemolding Corporation's Business.

7. Upon information and belief the Debtor was insolvent when it received the goods.

8. This Notice constitutes timely written demand for reclamation upon the Debtor.

9. Accordingly, Diemolding Corporation has satisfied the requirements of § 546(c) of the Bankruptcy Code. In the alternative to reclamation, Diemolding Corporation will seek a priority claim or lien in its favor in the amount of \$ \_141,589.83\_\_\_\_\_.

Diemolding Corporation

By:   
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